

Law Offices of  
**CLEMENTS & CROSS**  
**HOWELL G. CLEMENTS**  
**PAUL D. CROSS**

Suite 401, Park Plaza Building  
1010 Market Street  
Chattanooga, TN 37402  
423/757-5003  
Fax 423/756-9500

1020 West Main Street  
P. O. Box 99  
Monteagle, TN 37356  
931/924-2060  
Fax 931/924-2064

June 21, 2005

Mr. Harry S. Mattice, Jr.  
United States Attorney  
1110 Market Street, Suite 301  
Chattanooga, TN 37402

Re: United States v. Rejon Taylor, et al

Meeting with TBI in Nashville for firearms examination; request for production; dates to examine firearms pursuant to Rule 16 FRE; and Scheduling Order

Dear Mr. Mattice:

In the above-styled matter, we are concerned about scheduling and discovery. There are a number of items which have not yet been provided us, and we therefore request they be forwarded:

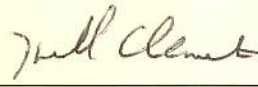
- (1) A copy of the Power Point production of the crime scene.
- (2) Copies of various photographs (primarily the van and the crime scene), a sample of which is enclosed for your perusal, which was previously sent to us and is unreadable. Please send Bill and I better copies or have the negatives for us to reproduce so that the photographs are both readable and meaningful.
- (3) Copies of documents relative to the St. James Apartment Complex. These documents are business checks of Guy Luck, various credit cards, and miscellaneous items pertaining to the State/Government's investigation. These apartments are believed to be in Conyers, Georgia. I think we were previously advised that Hamilton County had these documents but I am not sure. At any rate, this information is in your constructive custody.
- (4) Further, we have retained Kelly Fite, a firearms expert, to examine the weapons involved. We believe these to be a .38 revolver and a .9 millimeter. We have written your office twice, according to Bill, who is out of town, to arrange a meeting at the TBI office for Mr. Fite to

examine the weapons. Please work this out with the TBI.

Due to the nature of this case and the time constraints under which we must work, we need these items immediately. If we do not hear from you within the next 10 days, we will be forced to file the appropriate Rule 16 Motion and Motion to Enforce the Scheduling Order in order to have the production, inspection and discovery to which we are entitled.

Very truly yours,

Clements & Cross

By   
Howell G. Clements

HGC/rh



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NOTICE  
THIS AREA IS UNDER  
24-HOUR TV SURVEILLANCE  
TRESPASSERS WILL  
BE PROSECUTED

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